

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DOLLAREATHA EDWARDS,

Plaintiff,  
-against-

**NOTICE OF MOTION FOR  
SANCTIONS**

ROBERT WILKIE.  
*Secretary for the Department of Veterans Affairs*

CIVIL ACTION NO.  
16-8031 (LTS)(OTW)

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Special Hagan dated June 17, 2019 and Plaintiff's Memorandum of Law in Support of her Motions for Sanction, Plaintiff Dollareatha Edwards, by her undersigned counsel, will move this Court before the Honorable Ona T. Wang U.S.D.J., at the United States Courthouse, 40 Foley Square, New York, New York at a time to be determined by the Court for an order pursuant to Fed. R. Civ. P.30 and 28 U.S.C. § 1927. Plaintiff seeks the following relief: an order to re-open discovery for the limited ESI as detailed in Plaintiff's Memorandum of Law in Support and to serve and obtain responses for her requests for admissions.

Dated: Queens, New York  
June 17, 2019

/s/

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